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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

F. 100-100-100

APR 1 1996

In the Matter of)	
)	
Amendment of)	CC Docket No. 96-28
Part 68 of the Commission's)	RM-8621
Rules)	

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

COMMENTS

Sprint Local Telephone Companies ("Sprint") hereby files Comments to the Notice of Proposed Rulemaking ("NPRM") in the above-referenced docket.¹ The Commission seeks comments on the proposed amendment of Part 68 of the Commission's rules to harmonize United States and Canadian requirements for connection of terminal equipment to the public switched network. Sprint was pleased to participate in TR-41.9, the working group formulating the rules proposed by the Telecommunications Industry Association ("TIA"), and submits the following comments on the NPRM.

I. SPRINT SUPPORTS THE NPRM

Sprint agrees with the Commission's tentative conclusions, especially to adopt the TIA's proposed amendment to Part 68, with a few proposed corrections, as outlined in the attachment to these Comments.² As a participant in the process involving both U.S. and Canadian personnel, Sprint believes that adoption of the proposed rules will reduce differences

¹In the Matter of Amendment of Part 68 of the Commission's Rules, Notice of Proposed Rulemaking, CC Docket No. 96-28, released Feb. 28, 1996.

²NPRM, ¶20.

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in standards and testing between the U. S. and Canada, particularly in the area of terminal equipment.³ They will serve as a model for ongoing negotiations among the U. S., Canada, and Mexico, and perhaps others, under NAFTA and any succeeding treaties. The remaining difference between the Canadian requirements and these proposed requirements is that Canada retains the one surge test requirement. However, because the threat from lightning surges in Canada is much smaller, even in its most surge prone area, than the surge threat in many heavily-populated portions of the U. S., this exception is valid. We agree with the Commission's tentative conclusion that network protection should be maintained in the proposed rules.⁴

II. NEW SURGE TESTING REQUIREMENTS ARE NEEDED

Sprint strongly agrees with the TIA position,⁵ that the proposed surge testing requirements are needed to assure network protection from today's semiconductor telephone equipment in lightning prone areas. While consumers will experience greater reliability from telephones registered under the proposed rules, the primary goal of the working group drafting the proposed amendments was network protection.

The tentative conclusion regarding efficiencies in manufacturing and network protection⁶ may cause some to argue that the proposed surge requirement will cost more for testing than does the present requirement. However, other deleted requirements will result in savings. Also, depending on the design of the terminal equipment and the sequencing of tests,

³NPRM ¶24.

⁴NPRM, ¶23, 24.

⁵NPRM, ¶6.

⁶NPRM, ¶22.

the cost of surge testing alone may in fact be less under the proposed rules. Lifetime telephone costs to consumers will be lower in either case, due to improved equipment reliability. As a provider of reliable telephone terminal equipment to its customers, Sprint implemented surge requirements compatible with those proposed in the NPRM, a number of years ago, with no perceived difference in equipment costs. Sprint supports protecting the network with the proposed surge testing requirements.

III. TARIFFED DATA RATE SHOULD BE ADDED TO PART 68

Sprint strongly suggests adding to the amendments to Part 68 any tariffed data rate. Sprint proposes that the valid tariffed data rate of 38.4 kbps be added in at least §68.308(h)(1)(i)⁷ and Table 68.308(c)⁸ and Table 68.310(b).⁹ As an existing Sprint T1 subrate service, the tariffed data rate qualifies for protection in accordance with the purpose of the Part 68 rules.¹⁰

IV. CONCLUSION

Sprint agrees with the conclusions on the Commission, especially to adopt the TIA's

⁷NPRM, Appendix B, pg. 34.

⁸NPRM, Appendix B, pg. 35.

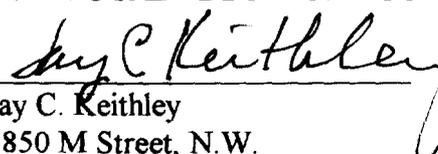
⁹NPRM, Appendix B, pg. 44.

¹⁰47 CFR 68, §68.1.

proposed amendments to Part 68, including the recommended corrections appended to these
Comments.

Respectfully submitted,

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ATTACHMENT

PROPOSED CHANGES TO THE WORDING OF THE PROPOSED RULES

Sprint proposes changes as follows to individual proposed requirements as stated in Appendix B.

A. In §68.302(d)(1)(i), in the first sentence, the word "all" needs to be added between the words "in" and "states", to be consistent with previous statements. In the same sentence, the word "effect" is misspelled and needs to be corrected to "affect".

B. In Table 68.304(a), Note (1), in the last sentence of the first paragraph, the reference to "§68.306(e)(i)" needs to be corrected to read "§68.306(e)(1)". In the last sentence of the second paragraph, the reference to "§68.306(e)(ii)" needs to be corrected to read "§68.306(e)(2)".

C. In §68.306(a)(1)(ii), the reference needs to be revised in this section and throughout the text to be "ohms". Also, throughout the text, the terms, watt (W) and volt (V) need to be capitalized when abbreviating the name of an electrical unit (5.0 V), and all lower case when spelling out the name of an electrical unit (1.0 volt).

D. In §68.306(a)(3)(i) and (a)(4), the phrases "... must be negative with respect to ground, shall not be more than -56.5 volts dc with respect to ground ..." and "... the dc component shall not exceed 5 volts. ..." are inconsistent. The dc voltage cannot both reach -56.5 volts dc and be limited to a dc component of 5 volts when not under the control of §68.308. To clarify, Sprint recommends that the two notes in the subsections which are indicated with an asterisk be changed to read: "the ac component shall not exceed 5 volts peak where not otherwise controlled by §68.308."

E. In §68.306(a)(6)(ii), the second line needs to be reworded for clarity to read “. . . significant positive dc voltage (not over +5 volts) with respect to ground: (A) for 2-wire . . .”.

F. In Fig. 68.306(a), in the graph, the different areas, specifically: a) “must trip”; b) “monitor voltage or trip required”; and c) “neither monitor voltage nor trip required” need to be identified. Table 68.306(c), calls for ring trip devices to operate “per Fig. 68.308(a)”, but the Figure does not describe such requirements.

G. In §68.308(b)(6)(i) and (ii), the two instances of: $\frac{\log(f/200)}{\log(2.5)}$ erroneously appear to be exponents of 9-3 and 10-4, respectively. They need to be lowered on the page to be on the same level with their intended factors to prevent misinterpretation.

H. In §68.308(e)(1)(i), the table’s middle column’s bottom two rows of text are one line too high up and do not line up.

I. In §68.308(g)(5), in the second sentence, §68.308(f)(1) without its subsections contains no requirements as indicated by the language. Other requirements must have been intended to be included to be applied to ringing. In the third sentence, the reference to §68.308(d)(2) is unclear because this subsection does not exist. Other requirements must have been intended to be included.

J. In §68.308(h)(1)(i), the phrase “72 kbps per second.” is redundant. Sprint recommends deleting the “ per second”.

- K. In Table 68.308(e), the number and title of the Table are identified at the top. Sprint recommends making the labeling for all tables in the text consistent for ease of reference and identification.
- L. In §68.308(h)(2)(ii), subdivisions need to be designated (A), (B), etc. instead of (a), (b) etc. to be consistent with the previous text.
- M. In Fig. 69.308(b), the Minimum and Maximum Curve Tables' titles need adjustment by making the sizes and placements of the titles "Maximum Curve" and "Minimum Curve" the same.
- N. In §68.310(a), three references to "Table 68.310-1" in the text need to read "Table 68.310-1(a)", as the table is labeled or the Table needs to be relabeled. Either way, the text reference and table number need to match.
- O. In §68.310(b), the reference to "Table 68.310(a)" needs to read "Table 68.310-1(a)," as it is labeled or the table needs to be renumbered to reflect the reference in the text. Either way, the text reference and table number need to match.
- P. In Table 68.310-1(a), under the column Substrate Digital at Longitudinal Termination - Z, the reference, "See Table 310-2," needs to read "See Table 68.310(b)," as the table is labeled.
- Q. In §68.310(c), in the last sentence, the word "for" is needed between the words "and" and "1.544" to be consistent with the preceding sentence.
- R. In Fig. 68.310-1(b), the schematic diagrams, legends, and references need to be made consistent. For example, add a comma between R_L and Z_i ; add designations for R_L and Z_i in the schematic diagram and Table 68.310-1 or -1(a) or 68.301(a); Show R_i in the schematic diagram; add a comma between R_{CAL} and Z_o ; add designations for R_{CAL} and Z_o in

the schematic diagram and Table 68.310-1(a) or as appropriate; and designate R1 in the schematic diagram.

S. In Fig. 68.310(d), the reference to “FIG. L3” is incorrect and needs to reference “Fig. 68.310(c)”.

T. In Fig. 68.310(e), one of two decimal points between 1 and 5 in “1.544 MHz” needs to be deleted.

U. In §68.312(c)(1), the second and final sentence is redundant and needs to be deleted.

V. In §68.314(c)(1), in the third line, the word "is" needs to be added between the words "resistance" and "connected".

W. In §68.314(c)(2), the final semicolon and “or” should be deleted. The sentence needs to end in a period.

X. In §68.314(c)(3), the sentence needs to be revised to read, “The above requirements also apply in the hold state and in any off hook state.” Not only do conventional offhook and hold apply but also mute, conference, speed dial programming, and any additional off hook state that may be developed in the future needs to be addressed.

Y. In §68.314(d)(1), the term “network protection devices” is incorrect and undefined in §68.3, “Definitions.” It should be replaced with the defined terminology, “registered protective circuitry”. The term “registered” needs to also be inserted prior to the words “terminal equipment”, to conform with the language in these rules.

Z. In §68.318(b), the title “Registered terminal equipment for automatic dialing”, needs to be changed to “Registered terminal equipment with automatic dialing capability” to avoid misinterpretation. The rules in §68.318(b) pertain to all equipment containing automatic

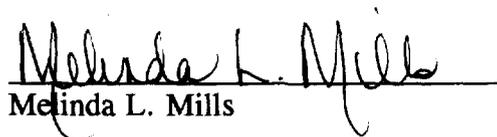
dialing capabilities (e.g. facsimile machines), whether or not that is the major feature (e.g. autodialers).

AA. In §68.3, in the definition of “Capture Level,” the last sentence needs to be deleted to avoid potential confusion. The “Overload Point” definition is defined later in the text.

BB. In §68.3, in the definition of “DTMF” Sprint recommends adding to the definition "Abbreviation for dual tone multi-frequency."

CERTIFICATE OF SERVICE

I, **Melinda L. Mills**, hereby certify that I have on this 1st day of April, 1996, sent via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Comments" of Sprint Local Telephone Companies in the Matter of Amendment of Part 68 of the Commission's Rules, CC Docket No. 96-28, RM 8621, filed this date with the Acting Secretary, Federal Communications Commission, to the persons on the attached service list.


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